

Terence C. Dougherty, Pro Se Litigant
Lisbet Drivdahl Dougherty (Spouse), Pro Se Litigant
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**IN THE UNITED STATES DISTRICT COURT
FOR THE PENNSYLVANIA EASTERN DISTRICT COURT
DISTRICT OF PHILADEPHIA**

LSF8 Master Participation Trust by	§	
Caliber Home Loans, Inc., solely in its	§	
capacity as servicer,	§	
PLAINTIFF,	§	
	§	
v.	§	Civil Action No.: <u>15 5005</u>
	§	
Terence C. Dougherty, Pro Se Litigant	§	
Lisbet Drivdahl Dougherty, (Spouse)	§	
Pro Se Litigant	§	
DEFENDANTS	§	

**DEFENDANTS MEMORANDUM IN SUPPORT OF
MOTION TO ENLARGE TIME**

Defendants asks this Honorable Court to grant additional time to file an Answer in Opposition to Plaintiff's Motion to Remand Case to State Court, as authorized by Federal Rule of Civil Procedure 6(b).

A. Introduction

1. Plaintiff is LSF8 Master Participation Trust By Caliber Home Loans Inc. Defendants are Terence C. Dougherty, Pro Se Litigant and Lisbet Drivdahl (Spouse), Pro Se Litigant.
2. Plaintiff sued defendants for Compliant In Mortgage Foreclosure on September 2, 2014.
3. Defendants filed a Notice of Removal under 28 U.S.C. §1446(a) on September 8, 2015.

4. Defendants are petitioning this Honorable Court for an extension of time to file an Answer in Opposition to Plaintiff's Motion to Remand To State Court.

5. Defendants contacted opposing counsel who declined to stipulate for an extension of time. Defendants filed this request for an extension as soon as they became aware of the need for additional time and before the deadline.

B. Argument

6. The court may grant a request for extension of time for "cause shown." Fed. R. Civ. P. 6(b).

7. Defendants requests the extension of time to research and prepare a proper written Answer in Opposition To Remand To Sate Court because defendants are Pro Se Litigants, defendants are not lawyers, defendants both work full time and there are complex issues and statements alleged by the Plaintiff's attorneys in their Motion.

8. Defendants asks the court to extend the deadline until December 17, 2015.

9. Defendants request for additional time is for cause shown, as stated in this motion, not to delay these proceedings. *See* Fed. R. Civ. P. 6(b).

C. Conclusion

10. For the reasons cited above defendants request this Honorable Court for the extension of time to respond to Plaintiff's Motion To Remand To Sate Court until December 17, 2015.

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Civil Action No.: 15 5005

Terence C. Dougherty, Pro Se Litigant §
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Pro Se Litigant §
DEFENDANTS §

ORDER GRANTING DEFENDANTS MEMORANDUM IN SUPPORT OF
MOTION TO ENLARGE TIME

AND NOW, this _____ day of _____, 201__ upon consideration of Defendants Motion for an order To Enlarge Time and Defendants Memorandum in support thereof, it is hereby ORDERED that:

1. Defendants Motion To Enlarge Time is GRANTED



Terence C. Dougherty